



**National Advisory Council for
Environmental Policy and Technology**

December 22, 2006

The Honorable Stephen L. Johnson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Initial Thoughts on Environmental Stewardship

Dear Administrator Johnson:

In May 2006, you asked the National Advisory Council for Environmental Policy and Technology to review and offer advice on EPA's efforts to advance environmental stewardship and cooperative conservation. This letter reflects the Council's initial thoughts about EPA's environmental stewardship initiatives. While we have yet to turn to cooperative conservation in any detail, we did want to convey our initial impressions and pose some questions about the Agency's embrace of environmental stewardship.

The National Environmental Policy Act, passed more than 35 years ago and before the Environmental Protection Agency was established, proclaimed the following bold vision of environmental stewardship for the Federal government and America:

[T]he Federal government, in cooperation with the State and local governments and other concerned public and private organizations, [should] use all practicable means and measures ... to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.

The vision of environmental stewardship proposed by EPA's Innovation Action Council in its report, *Everyday Choices: Opportunities for Environmental Stewardship*, incorporates this NEPA stewardship vision and explains how it can apply in addressing early 21st century issues:

As our population and economy continue to expand, the U.S. can accelerate environmental progress while simultaneously strengthening our global competitiveness. In short, we have exciting opportunities to create a more sustainable future in this country and with our partners around the world. However, this bold goal cannot be accomplished by government alone; rather it

requires the active engagement of all people. To this end, we have a vision of environmental stewardship – where all parts of society actively take responsibility to improve environmental quality and achieve sustainable results.

NACEPT applauds and supports this vision. Over the past several months, NACEPT has met with EPA management and career professionals to discuss the IAC report and your charge to the Council. NACEPT has established a Work Group of Council members (chaired by Erik Meyers and Jennifer Nash) to take the lead in shaping recommendations. The membership of the Work Group is diverse, representing local and state government, business, law and architectural professions, academia, and conservation organizations. We have held a number of working sessions, in person and via teleconference, of the Work Group and the full Council. From these discussions have emerged several points of consensus and a few questions.

First, the IAC report announces a vision of an enhanced role for EPA in promoting environmental stewardship. While, again, we concur with the vision, we have some questions about implementation. Will EPA's new emphasis on stewardship require new activities and programs or, instead, will the Agency reframe existing activities and programs? In either case, will new resources be required? If new resources will be needed to pursue the vision, does the Agency envision a reallocation within the existing overall budget or would it seek increased funding in order to address environmental stewardship?

In our view, environmental stewardship will require a shift in EPA's organizational culture and a shift in the cultures of other institutions as well. We acknowledge that cultural change is difficult to achieve and may take many years. Our view is that such a shift can occur when there is an acknowledgement that "business as usual" is no longer sufficient or efficient. From reading the *Everyday Choices* report, NACEPT concludes that EPA acknowledges and supports societal changes that embody stewardship. However, we are uncertain as to the Agency's views on the urgency or magnitude of the changes necessary.

To help EPA career professionals appreciate the need for change and to help the public and various stakeholders embrace stewardship behavior, EPA will need to be more specific on the estimated time frame. Although some may believe that successfully making the major shift to environmental stewardship is likely to take at least a generation to realize, the Council believes much can (and should) be accomplished now. Motivating an agency of 18,000, let alone a nation of many interests, will require a clear signal that all elements of society need to share in the effort to achieve environmental quality, economic improvement, and social equity at home and abroad.

We believe that creating an enhanced EPA role in environmental stewardship will entail much more than simply rebranding its current voluntary programs. NACEPT discussions to date agree that important roles for EPA in stewardship will include supporting other actors and removing obstacles to stewardship and sustainable action. EPA can also provide leadership by modeling behavior, actions, and attitudes to provide illustrative case studies from which others can learn and emulate.

However, another important message of *Everyday Choices*, with which we strongly agree, is that EPA cannot achieve the goal of environmental stewardship working on its own. At this point in our review, NACEPT is unclear what specific activities EPA envisions for building support for stewardship among all sectors of society – public and private organizations, communities, and individuals. We are also unclear on which EPA programs and activities the Agency believes fit under the stewardship heading and which do not. We expect to examine these implementation questions during the coming months in order to make additional observations and recommendations to you in 2007.

Second, as EPA moves to embrace environmental stewardship more fully, it should consider how it will assess the effectiveness of these efforts. As a preliminary matter, EPA's evaluation of its stewardship efforts is likely to require new measures of system effectiveness. We suggest that these may be more outcome-related than output measures, such as, for example, viewing stewardship efforts as they simultaneously affect the community, economy, and environment – a systems approach.

Positive improvements in environmental quality in a region or the Nation as a whole, as reflected in EPA's *Report on the Environment*, may be among the best metrics, although establishing the causal link between such improvements and EPA's stewardship activities would be difficult. Internally, we believe that EPA will need to begin by examining current employee job descriptions, performance plans, office performance, and interdependence of staff and program requirements to assess the degree to which stewardship is incorporated, including whether stewardship is encouraged or inhibited.

Third, it is essential that the Agency be perceived as encouraging others to become stewards and assume responsibility within their spheres of influence and control, while continuing to maintain its robust regulatory role. We observe that EPA's traditional environmental regulatory role has contributed and continues to contribute to sustainability and a higher quality of life. We would expect the proposed greater emphasis on environmental stewardship will help the Agency be even more effective in the years ahead. The IAC report contains hints that the Agency can integrate stewardship into its regulatory actions, and we concur that this integration would be valuable.

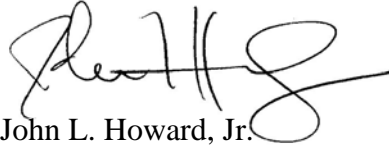
The Work Group and Council's next steps in responding to your charge will be to look at how the Agency can best:

- Implement the IAC environmental stewardship recommendations;
- Reach out and engage individuals in environmental stewardship;
- Implement its commitment to cooperative conservation; and
- Involve other types of stakeholders in environmental stewardship and cooperative conservation.

NACEPT Letter to Administrator Johnson

We appreciate the opportunity to provide these initial reflections on the environmental stewardship portion of your charge to NACEPT. By acknowledging the need to embrace and promote environmental stewardship, EPA also acknowledges the dynamic and interdependent natures of the environment, economy, and society. We applaud the Agency for working to advance environmental stewardship and cooperative conservation, and we look forward to submitting our report to you in 2007.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John L. Howard, Jr.", with a stylized flourish at the end.

John L. Howard, Jr.
Chair

cc: Erik Meyers, Working Group Co-Chair
Jennifer Nash, Working Group Co-Chair
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